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Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re:)	
)	Case No. 18-31084-dwh13
Zoe Nicolina Dejeu,)	
)	NOTICE OF INTENT TO AMEND
)	PLAN BY INTERLINEATION AND
<u>Debtor.</u>)	SEEK ORDER

Debtor hereby gives notice of her intent to amend her Amended Chapter 13 Plan Dated June 6, 2018 via interlineation, and to seek the entry of the attached *Order Confirming Plan and Resolving Motions*, a advance copy of which is attached hereto as *Exhibit A*.

The proposed amendments to the Plan via interlineation will change the dividend to general unsecured creditors from the approximate 8% as stated in the Amended Plan to a minimum, non-modifiable, 100%.

An adjourned confirmation hearing has been scheduled for August 30, 2018 at 1:30 p.m. by telephone. To participate in the hearing, dial 888/684-8852, and enter access code 5870400.

YOU ARE NOTIFIED that unless you file an objection to this Notice no later than 28 days after the service date set forth below, and set forth the specific grounds for the objection and your relation to the case, with the Clerk of Court at 1001 S.W.

1 - NOTICE OF INTENT TO AMEND PLAN BY INTERLINEATION AND SEEK ORDER

1 Fifth Avenue #700, Portland, Oregon 97204 and serve it on Debtor's
2 attorney (Todd Trierweiler, 4721 N.E. 102nd Avenue, Portland, Oregon
3 97220), the undersigned will proceed to seek entry of the order at
4 the August 30 hearing.

5 Respectfully submitted this 19th day of July, 2018.

6
7 /s/ Todd Trierweiler
8 Todd Trierweiler
9 OSB #85348
Attorney for Debtor

10 I certify that on July 19, 2018, I served copies of the
11 foregoing *Notice of Intent* on Debtor, Trustee (via ECF), U.S.
12 Trustee (via ECF), any parties requesting special notice, and all
creditors.

13 /s/ Todd Trierweiler
14 Todd Trierweiler
15 OSB #85348
16 Attorney for Debtor
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2 - NOTICE OF INTENT TO AMEND PLAN BY INTERLINEATION AND SEEK ORDER

Exhibit "A"
For Notice Only -- Not For Entry

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re _____)
) Case No. _____
)
)
) CONFIRMATION HEARING DATE: _____
)
) **ORDER CONFIRMING PLAN**
) **AND RESOLVING MOTIONS**
Debtor(s) _____)

The debtor's plan having been provided to creditors and the Court having found that it complies with 11 USC § 1325, now, therefore IT IS ORDERED:

1. Debtor's plan (Docket # _____) is confirmed, and all relief requested in the plan is granted. All references to the plan are to the plan as modified by any amendment shown in ¶ 4 below.
2. Pursuant to 11 USC §522(f)(1), the following liens are avoided [listed alphabetically, and only one per line, including each creditor's name, service address, and lien type (e.g., judicial lien or non-purchase money security interest)]:

3. Per the filed *Application for Compensation* (LBF 1305) and, if applicable, the *Fees and Expenses Itemization Through* _____ (LBF 1306), compensation to debtor's counsel of attorney fees of \$_____ and expenses of \$_____, of which \$ _____ has been paid, leaving \$_____ to be paid as funds become available per plan ¶ 4(c).

4. Debtor has moved to amend the plan by interlineation as follows, which amendments are allowed and become part of the confirmed plan:

5. The terms of this order are subject to any objection filed within 21 days by [listed alphabetically, and only one per line, including each creditor's name, service address]:

Additional Provisions, if any:

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I certify that on _____ I provided this Order to the Trustee for submission to the court.

Debtor or Debtor's Attorney

Approved: _____
Trustee